

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
EDUCATION, et al.,

Defendants.

NO. 2:25-cv-01228-KKE

DECLARATION OF KRISTIN  
BARANSKI

**DECLARATION OF SANTEE SCHOOL DISTRICT**

I, KRISTIN BARANSKI, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I am Superintendent of Santee School District. I am over the age of 18 and have personal knowledge of all the facts stated herein, including knowledge based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I submit this Declaration in support of the Plaintiff States' Motion for Preliminary Injunction.

**Background**

3. Superintendent of Santee School District for 8 years and 32 years in education, including teacher elementary vice principal and principal, and director of curriculum and educational services, doctorate in organizations administration.

4. Santee School District is a TK – Grade 8 public elementary school district, providing an extraordinary schooling environment with caring staff.

5. As the Superintendent of schools, I supervise all district projects including Project SOAR, the federal mental health grant focusing on reducing student-to-counselor ratios, increasing recruitment of providers, enhancing staff retention through professional development, enhancing comprehensive mental health services, and expanding case management collaboration at Santee School District. As a supervisor, overseeing multiple federal grants over the course of my educational experience, during both Democratic and Republican administrations, the funding of these grants has always been provided and the district has maintained proper records and

evaluation of each grant. I've overseen and managed federal Title VII grants, all Title I-III programs, and three Department of Defense grants.

6. This includes my role as a Superintendent for Santee SOAR, Award #S184H240248, which Santee School District received as part of the Department's Mental Health Service Professional Demonstration Grant Program.

**The Department's Funding and Discontinuance of SANTEE SOAR**

7. The Mental Health Service Professional Demonstration Grant (MHSP) attracts candidates for school-based mental health professions, including school psychology, and provides training opportunities for students in rural and other high-needs local educational agencies (LEAs) (also referred to as school districts). MHSP facilitates partnerships between high-needs school districts and institutions of higher education, allowing opportunities for practicum students and interns to obtain required clinical supervision and increase additional children and youth's access to school mental health services.

8. Santee School District applied for a multi-year MHSP grant on May 13, 2024.

9. In its application, Santee School District explained our need for additional service providers to come closer to the profession's student to counselor ratios and to retain highly qualified counselors. To meet that year's MHSP program priorities, Santee School District proposed the following goals for its MHSP project: reducing student-to-counselor ratios by adding 4 counselor/social workers to the counseling team, increasing recruitment of providers, enhancing staff retention through professional development, enhancing comprehensive mental health services, and expanding case management collaboration.

10. On December 23, 2024, the Department awarded Santee School District, Project SOAR, Award No. S184H240248, as evidenced by Attachment A. The performance period for

this grant was 2025-2029 and authorized funding for the initial budget period of January 1, 2025 – December 31, 2029.

11. Since the Department has awarded Santee School District this grant, the District updated a social worker job description to improve recruitment efforts and the district hired 4 counselor/social workers in May 2025 based on this anticipated revenue stream for four years.

12. In my experience, discontinuance of a project's funding is rare and I have never had a project's funding discontinued or terminated. To my knowledge, prior to 2025, discontinuance or termination has only occurred in cases of misconduct, typically with prior notice and opportunities to respond and correct any underlying issues.

13. Nevertheless, on April 29, the Department sent notice that Santee School District's MHSP award would be discontinued at the end of the grant's current budget period, which is December 31, 2025. Given that the Department originally approved this grant's performance period through December 31, 2029, Santee School District faces a loss of \$2,142,036 in prospective funding, including \$535,509 that it had expected to receive for the 2026-27 school year.

14. The notice came without any previous process or communication about the discontinuance from the Department, just four months after the initial award communication. It purported to discontinue the grant based on 34 C.F.R. § 75.253(a)(5) and (f)(1). These regulations allow the Department to not continue a grant if it determines that continuation of the project is not in "the best interest of the Federal Government." 34 C.F.R. § 75.253(a)(5); 34 C.F.R. § 75.253(f)(1). In making this determination, the Department limited its considerations to "any relevant information regarding grantees' performance." 34 C.F.R. § 75.253(b). However, this notice failed to cite anything regarding Santee School District's performance.

15. Rather it “determined that the grant specified above provides funding for programs that reflect the prior Administration’s priorities and policy preferences and conflict with those of the current Administration.” It then went on in boilerplate fashion to list a mishmash of reasons, claiming the programs: “violate the letter or purpose of Federal civil rights law; conflict with the Department’s policy of prioritizing merit, fairness, and excellence in education; undermine the well-being of the students these programs are intended to help; or constitute an inappropriate use of federal funds.” Based on this boilerplate language, Santee School District has no way of knowing which reason(s) applied as the Department’s basis for discontinuing the MHSP grant for Project SOAR.

**Harms from the Department’s Decision to Discontinue Santee School District Grant**

16. The discontinuance of the Santee School District’s MHSP grant will end Project SOAR.

17. Although Santee School District can still access funding through the end of our current budget period on December 31, 2025, Santee School District is already experiencing the harmful effects of this discontinuance. The overarching goal of school counseling is to remove social-emotional barriers, enabling all students to access their education and to succeed. This mission is particularly urgent in Santee, where our community has faced persistent mental health challenges, including elevated suicide-related hospitalizations and the generational trauma from the Santana High School Shooting in 2001. These factors compound our mental health needs and highlight the immediate necessity for preventative services. By reducing the four newly hired counselor/social workers within a year/s time, will greatly diminish the District’s capacity to remove social-emotional barriers in our schools.

18. Moreover, if the Department does not rescind its discontinuation decision, four schools will be greatly impacted by the loss of a school counselor/social worker initially hired to

work in four of our schools with the highest student risk factors: social-emotional needs and higher suicidal ideations. If we are forced to layoff these four counselor/social workers, the trusting relationships they build with students will be gone as well as the trusting relationship the District has with all counseling staff.

19. In addition, four of the newly hired counselors/social workers will be terminated at the end of the 2025-26 school year.

20. There is no way to recover lost time or restore continuity once disrupted, and staff who depart will take their training and expertise with them, requiring new investment in recruitment, hiring, and training.

### **Conclusion**

21. The discontinuances of Santee School District's MHSP grant undermines the District's mission in providing an extraordinary education with caring staff as well as the Department's "mission to ensure equal access to education and to promote educational excellence throughout the Nation." 20 U.S.C. § 1228a(a). These discontinuances make it harder to train and secure talent and to fund providers so that our children may access mental health services. To meet budgetary deadlines, Santee School District and its partners are making difficult decisions in the next few weeks and are already in the process of terminating staff positions that support these Programs and informing graduate students that they have lost significant tuition assistance. These harms are ongoing and will be irreparable if they are not stopped.

22. The overarching goal of school counseling is to remove social-emotional barriers, enabling all students to access their education and to succeed. This mission is particularly urgent in Santee, where our community has faced persistent mental health challenges, including elevated suicide-related hospitalizations and the generational trauma from the Santana High School

Shooting in 2001. These factors compound our mental health needs and highlight the immediate necessity for preventative services. The discontinuation of this four year grant will impact our community greatly.

23. On July 2, 2025, Santee School District withdrew its request for reconsideration/objection/appeal.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 2<sup>nd</sup> day of July, 2025, at Santee, California.

  
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KRISTIN BARANSKI  
SUPERINTENDENT